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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ORIGINAL

ALLEN MORSLEY,
petitioner

CASE# 1:01-cv-1003

VS.

DONALD ROMINE,
respondent

FILED
HARRISBURG, PA

DEC 10 2001

PETITIONERS RESPONSES TO RESPONDENTS MOTION
FOR ENLARGEMENT OF TIME PURSUANT TO FED.R.
OF CIVIL PROCEDURE , 6 (b) .

MARY E. D'ANDREA, CLERK
Per _____
Deputy Clerk

NOW COMES , the petitioner , Allen Morsley proceeding Herein pro se, hereby moving this Hon. Court to Compell Counsel For the Respondent to Now Show "Proof" that Counsel Who Prosecuted Petitioners Case (Christine B. Hamilton) Was Authorized to Practice Law at the Time of petitioners Trial Under North Carolina State Law ' And Further That She is Now Authorized To Practice Under North Carolina State Law , As Well as North Carolinas state Bar Assossiation. As petitioner Has Alleged that Counsel who prosecuted his Case Was Not Authorized ' (See Motion For Discovery , And Request For Admissions).

2. Petitioner Further Objects to the Idea that Counsel For the Respondent May Find it ' Necessary to Request The United States Attorneys Office in the Eastern District of North Carolina To Respond to the Allegations of Petitioners Claim , As the petitioners Case Has been Recorded , And Is A Matter Of Record.
3. Further if this Honorable Court Does Not Find Any Merit to petitioners whish for and Unbiased /Hearing / Trial / O(r) Order. Petitioner Moves This Honorable Court to Order North Carolina District Attorneys Office to First Send the petitioner A Copy " Of the Entire Trial Transcripts" Along with any Statements or exhibits that May Be Relied Upon" So that this Honorable Court Might See Petitioners Case on the Same Leveled Feild .

STANDARD OF REVIEW

Pro se, Submissions, "However" inartfully Pleaded" Must be held to Less Stringent Standards than formal pleadings that are Drafted By a Lawyer. HAINES vs. KERNER , 404 U.S. 519 , 30 Led.2d. 652, 92 Sct. 594 , SEE LEWIS vs. ATTORNEY GENERAL OF THE UNITED STATES, 878 F.2d. 714, 722 n. 20 (3rd. Cir. 1989); SMALL vs. LEHMAN , 98 F3d. 762, 776 (3rd. Cir.96)

" Finally, where a pro se, Complaint Contains " potentially cognizable Claims, a plaintiff should be Allowed to Particularize the claim.

SEE COLEMAN vs. PEYTON, 340 F2d. 603, 604 (4th. Cir. 1965); GORDON vs. LEEKE, 574 F2d. 1147, 1151, (4th. Cir. 1978); THEN vs I.N.S. cite as 58 F. supp. 2d. 422 (D. N.J. 1999).

RESPECTFULLY SUBMITTED THIS DAY

Nov. 29, 2001

Mr Allen Morsley 14718056
MR , ALLEN MORSLEY # 14718056 ,
F.C.I. EDGEFIELD
P.O BOX 724
EDGEFIELD SC. 29824.

CERTIFICATE OF SERVICE

I Certifie that i am the petitioner in the Case of Allen Morsley vs. Donald Romine . And that on this Day Nov. 29, 2001 I Have Placed a copy of the Following in the Mail to be severed upon Counsel for the Respondent . PETITIONERS RESPONES TO RESPONDENTS MOTION FOR ENLARGEMENT OF TIME , PURSUANT TO FED. R. OF CIVIL PROCEDURE 6(b).

MARTIN C. CARLSON , UNITED STATES ATTORNEY.
MATHEW E. HAGGERTY, ASS. UNITED STATES ATTORNEY.

228 Walnut Street , 2nd Floor,
Harrisburg Pa. 17108.


MR ALLEN MORSLEY 14718056.